

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

MIND YOUR BUSINESS, INC.,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

20-429 C

No. _____

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

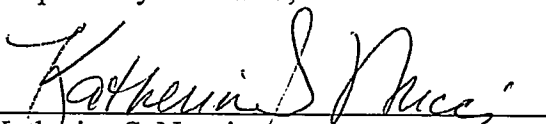
Pursuant to the Rules of the U.S. Court of Federal Claims, Appendix C, Section III, Plaintiff Mind Your Business, Inc. respectfully requests leave to file its Complaint in this bid protest action under seal.

Certain portions of the Complaint reveal confidential and proprietary proposal information, as well as source selection information, related to quotations submitted to the U.S. Department of Labor ("DOL") in response to Request for Quotes No. 1630DC-19-Q-00009, DOL's evaluation of the quotations and source selection decisions, subsequent protests filed by MYB at the U.S. Government Accountability Office ("GAO") (docketed as B-417887 and B-417887.2), and DOL's most recent decision to award a task order to Information Systems & Networks Corporation. The GAO issued a protective order in connection with MYB's second protest, and DOL responded to MYB's document request pursuant to the protective order before taking corrective action that rendered the second protest academic. Plaintiff will promptly file a Motion for a Protective Order to be issued by the Court in this action.

Plaintiff's Complaint is marked in such a way (within brackets) that confidential, proprietary and source selection information is indicated, and it is accompanied by a redacted version that will be available to the public.

Wherefore, Plaintiff respectfully requests that the Court issue an order granting this motion.

Respectfully submitted,



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Of Counsel:

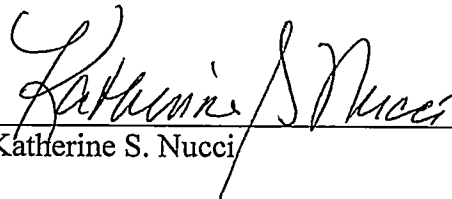
Scott F. Lane
Jayna M. Rust
Thompson Coburn LLP

Dated: April 14, 2020

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2020, I caused copies of the Plaintiff's Motion for Leave to File under Seal to be served by electronic mail upon:

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Katherine S. Nucci